

THE HONORABLE RICARDO S. MARTINEZ

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

TRU QUOC TRUONG,

Defendant.

NO. CR06-00307RSM

STIPULATED MOTION TO
CONTINUE PRETRIAL MOTIONS
DEADLINE

COMES NOW the Defendant, Tru Quoc Truong, through his attorney, Jeffrey Steinborn, and moves this Court for an order continuing the pretrial motions deadline in this matter, currently scheduled for May 28, 2009. Trial is currently scheduled for July 6, 2009. This motion is based upon the records and files herein and the following:

The Defendant was arrested in connection with a wiretap. Discovery is voluminous and counsel needs additional time for its review to determine whether or not there are any relevant pretrial motions that need to be filed before the July 6, 2009 trial date.

This motion is not made for the purpose of delay, or for any other improper motive, but is instead made based upon a good faith belief by the parties that such a

STIPULATED MOTION TO CONTINUE
PRETRIAL MOTIONS DEADLINE - 1

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1 continuance is necessary so that the parties can properly prepare pretrial motions and for
2 trial, in the event one is necessary.

3 There have been no previous continuances in this matter.

4 Assistant United States Attorney Lisca Borichewski agrees with this motion.

5 WHEREFORE, and by reason of the above, counsel respectfully moves this court
6 for an order continuing the motion deadline from its current date of May 28, 2009 to June
7 8, 2009.

8 Dated this 28th day of May, 2009.

9 Respectfully submitted,

10 Tru Quoc Truong, represented by;
11 JEFFREY STEINBORN, PLLC
12 s/ Jeffrey Steinborn, PLLC
13 WSBA # 1938
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15 UNITED STATES ATTORNEY'S OFFICE

16
17 By /s/ per telephone authorization
18 Lisca Borichewski
19 Assistant United States Attorney
700 Stewart Street
Seattle, Washington 98101
553-7970

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this day, I electronically filed the (foregoing) with the clerk of the court using the CM/ECF system which will send notification of such filing to the attorney(s) of record for the defendant(s). I hereby certify that I have served any other parties of record that are non CM/ECF participants via Tele-fax/US postal mail.

Dated this 28th day of May, 2009.

s/Tracee Tomich, Legal Assistant

JEFFREY STEINBORN, PLLC

Counsel for Defendant Truong

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